

**AFFIDAVIT OF CORPORATE MANAGER NICHOLAS FIORILLO IN
SUPPORT OF THE DEBTORS OCEAN DEVELOPMENT PARTNERS,
LLC AND GOTSPACE DATA EQUITY FUND, LLC EMERGENCY
MOTION TO REQUEST FOR A 30 DAY EXTENTION TO ENGAGED
ADDITIONAL AND/OR SUBSEQUENT COUNSEL AND
ENLARGEMENT OF TIME TO RESPOND TO TRUSTEE MOTION
TO CONVERT AND REQUEST FOR EVIDENTIARY HEARING TO
DETERMINE THE VALIDITY OF CREDITOR RAYMOND C GREEN
TRUST AND S & Q DATA, LLC DEBTS AND NOTICE OF FEDERAL
BUREAU INVESTIGATION INQUIRY**

I , Nicholas Fiorillo, as corporate manager of Ocean Development Partners, LLC, and GotSPACE Data Equity Fund, LLC, the Debtors-in-possession in the above-captioned matter (the Debtors) respectfully submit this affidavit in support of the emergency motion filled by the debtors and have now attached the previously requested supplemental information, supporting documentation and further background information and communications that was previously provided in confidence. Which had been earlier requested to be turned over, by the US Attorney Eric Bradford, during the two 341 meetings that he conducted for the Debtors in the above captioned cases. I further submit this affidavit in hopes that the court will immediately allow the emergency motion and request for a 30 day continuance so requested. Whereas, in my corporate capacity as manager of the debtors, can immediately engaged additional and/or successor counsel for the corporate debtors and it's corporate officers. I also caused the debtors request to enlarge the time to respond to the United States Trustee's Motion to Convert to Chapter 7 and also set down an evidentiary hearing in thirty (30) days.

I, Nicholas Fiorillo am submitting this affidavit to court in hopes to shed light on the true facts and circumstances that have involved a consorted effort to upend the rights and protections afforded to all debtors that seek the protections and guidance of the Chapter 11 provisions of the United States Bankruptcy Code. My affidavit and substantive evidence submitted here today, exposes the clear pattern of predatory lending and loan sharking that the two main creditor's, Raymond C Green Trust and S & Q Data, and the individual "bad actors", Raymond Green, Joane

Green, Spiro Stirvianoplous, Peter Spitalny, Jake Spitalny, Sam Spitalny, Thomas Quinn, Stewart Bornstien and their Attorneys George Mclaughlin, Jeffery Hellman and Kevin Peters and other suspect individuals of the this criminal enterprise, have been hiding behind the corporate veils of Raymond C Green Trust and S & Q Data, S & J Storage Bros. Where this entire group has been conspiring to usurp and illegally foreclose on unlawful extensions of credit and usurp upwards of 350% in usurious interest not due or owing and have been extorting, by threats of economic and bodily harm. Where they continue to illegal demand the Debtors turn over millions of dollars of cash and real estate, not due or owing the creditors. In a clear pattern of systemic predatory lending and loan sharking, where this criminal group is being directed by the leaders of this racketeering enterprise; Ray Green and Peter Spitalny by and through their continued tactical control of this criminal group that has been continually harming the debtors and Nicholas Fiorillo, that is clearly illegally obstructing any hopes of the legitimate creditors of the estates any chances of a full recovery, upon the successful reorganization of the Debtors. I, Nicholas Fiorillo, do further state under the pains and penalties of perjury the following facts and events that have continued to harm the debtors and Nicholas Fiorillo, as we are clear victims of an criminal predatory loan sharking organization.

1. On or about March 10, 2022, the United States Trustee filed a Motion to object to the engagement of debtors counsel, Shawn Masterson and soon their after filed motions to convert the Chapter 11 cases to a Chapter 7 liquidation of the debtors estates. Wherein Attorney Bradford has stated three main reasons for his motions to convert: 1. Debtors Counsel was not properly engaged or compensated 2. Myself, Nicholas Fiorillo, whom is not a subject of the bankruptcy, was being evasive and not forthcoming in appearing at the 341 meetings. 3. Attorney Bradford's conclusion of the of debtors corporate testimony from the 341 meetings, is some how untruthful and he can not conclude that the debtor, has any assets or any ability to reorganize and in addition to those reasons. The US Attorney has stated openly to debtors counsel he was certain, that I was mentally unstable, on the verged of a mental break down and unfit to be in front of this court.

2. I, Nicholas Fiorillo further attest and state on the record the following under oath, where I am hopeful the court will immediately move to remove attorney Bradford for the various reasons set out in my affidavit and will see Attorney Bradfords crystal clear attempts to obstruct justice and prevent the debtors from completing the successful Chapter 11 reorganization plan. Where is Attorney Bradfords continued tortious interference to prevent our own legal counsel to be engaged during a Federal proceeding. Wherein, his continued failure to timely inform Boston Office of the Federal Bureau of Investigation, I have proffered substantial supporting evidence and many documents, e-mail communications, and recordings of this groups ongoing criminal extortion of the debtors and myself.
3. Where I have stated numerous times to Attorney Bradford at both 341 meetings he had conducted and numerous discussions between myself, debtors counsel and Attorney Bradford. Where he has in fact, been presented damning evidence of the ongoing criminal conspiracy that has been operating underneath his administration and investigation that was discovered and brought to light, during testimony that was put on the record at the 341 meetings he conducted. Where both Raymond C Green Trust and S & Q Data and S & J Storage Bros, are clearly operating as a criminal group to collect an unlawful debt where they, through a consistent pattern of extortion, embezzlement and threats of financial and physical harm, have been the weapons of choice, used to extort both money and property away from the Debtors and Nicholas Fiorillo.
4. I Nicholas Fiorillo, have in fact made financial arrangements with Attorney Shawn Masterson and had properly retained Debtors counsel prior to the last hearing before this court, where Attorney Bradford initially attempted to convert both Debtors to chapter 7. Wherein, Attorney Masterson has since filed the appropriate motion and has enter his appearance. Where at different times during the two 341 meetings and other interactions, Attorney Bradford and these so called creditor's counsel, when it suited their line of questioning, would allow Debtors counsel to provide legal advice. Where when it did not suit them or Attorney Bradford's line of questioning, as a collective group, they would not allow Debtors' counsel to represent the Debtors and Nicholas Fiorillo.
5. Attorney Bradford has continued to purport that dates he set down for for 341 meetings were not being respected, and the Debtors where being evasive, even though he knew: 1. Debtor 1st Counsel was terminated in proper course and for genuine conflicts raised with Attorney Bradford himself, whom he never confirmed with me, any dates that I was to appear. Where he knew I had no effective counsel, he was not challenging to remove from representation of the

Debtors. Unbeknownst to me, Attorney Bradford was also intimately associated with Debtors prior counsel, in their collective hopes to get to the Supreme Court together. Where is was informed by both Debtors prior and a successor counsel. Attorney Perez Kudzma could not effectively defend the Debtors, where she stated she could “never go against or stand up to Attorney Bradford, for fear her Supreme Court hopes, would be dashed”. She was incapable of providing prudent and aggressive legal counsel, that the debtors desperately needed. Where she informed me, Attorney Bradford was clearly working with the two suspect creditors and believed he was has set out to entrap me on some sort premeditated manufactured perjury case he could bring against me.

6. Since the Debtors where not given any time or ability to consult with their subsequent attorney effectively and to set down agreeable dates with proper time to prepare with successor counsel. Nicholas Fiorillo, had already informed Attorney Bradford, he would not be able to attend the dates he had scheduled for the 341 meetings. Attorney Bradford continued to badger and insisted the debtors must appear at certain dates and times that he clearly knew, I could not attend, whee he knowingly make such meetings during the times and dates he was demanding, as I was traveling outside of the United States.
7. It is obvious to me, Attorney Bradford set out to create the appearance that the Debtor was being evasive, and untruthful, even though I had noticed specific dates for the 341 meetings, where I was back in the United States and able to meet and consult with attorney Masterson and was available to attend. Only at the start of the 341 meeting, did Attorney Bradford, look to block and object to Shawn Masterson representing the debtor and myself during the meeting, which clearly prevented the us from receiving the proper representation from our counsel.
8. Attorney Bradford, continued to challenge to prevent the debtor and myself the benefit of proper legal representation of successor counsel at the 341 meetings, has harmed the Debtors and myself and has infringed upon my legal rights to due process. It is clear to me, this was all done in a purposeful and rather transparent attempt to put the Debtor and myself in a clearly disadvantageous position, in not being able to consult with any counsel during the over 5 ½ hours that Bradford held for the 341 meetings, which has since subsequently been concluded.
9. The Debtor along with myself as corporate manager of the companys are entitled to an evidentiary hearing on both matters in front of this court to further fact find and present to the court the entire set of facts that are materially different than the facts Attorney Bradford has misquoted and taken out of any context of reality from the record of the 341 meetings . Being that the removal of corporate counsel from the case is unjust and unfounded and Attorney

Braford's now 2nd attempt to convert the Debtors to a Chapter 7 liquidation are unjust and deficient when the totality of the facts are reviewed in due course.

10. I can attest and request that the record from the 341 meetings be transcribed and filed on the docket for all to review, where the testimony given in my role as corporate officer of the debtors clearly identifies the Debtors' assets, it's many millions of dollars in equity in such assets and it's clear and articulated path to the immediate filing of their 100% Chapter 11 reorganization plans. In addition, Attorney Bradford's motion to object to Debtors counsel being able to be admitted to the cases and his overzealous need to conduct his 341 meetings, where he clearly allowed Debtors Counsel to act as Debtors counsel when it suited his objectives, counter measures the obvious and obstructionistic true intent of Attorney Bradford to prevent both Debtors and myself, in a Federal proceeding, without proper legal council. It is because of these and other actions of Attorney Bradford, the Debtor be granted time to engaged additional and/or successor council and time to properly prepare an objection to Attorney Bradford's motions to convert to Chapter 7 liquidation. Once the court conducts it's evidentiary hearing and review the record from the 341 meetings that were conducted the fact will prove out that both Attorney Bradford's motion to object to Debtors Counsel Masterson representation will fail and his Chapter 7 motions and attempts to convert the estates of the Debtors, have been heavily based on a series of misstatements, mistruths and contextually inaccurate and completely out of context, statements that he purports that I either failed to make, made under false pretenses or made to court in such a challenged state of mental instability, both his motions should be denied.
11. It is crystal clear there has been apparent manipulation of the facts in his motion that is the polar opposite of the actual testimony that I had given on the record. Where, I am of the belief, because I have now exposed him for the various miscarriages of justice he has exposed the debtors and myself to. Attorney Bradford is making an attempt to prosecute me for perjury for my alleged false statements that he purports I have made to the court.
12. It is based on the circumstances that have been detailed in this affidavit and further detailed in my attached supporting evidence. I was clearly under duress when I filed out the Debtors financial affairs and bankruptcy schedules on the eve of Bankruptcy and was granted time to update such schedules and financial affairs and now Attorney Bradford clearly attempting to continue his pattern of "gaming the legal system" to the detriment of the legitimate creditor's, the debtors estate and to myself the corporate manager of the debtors. I respectfully request that record must be reviewed in its totality for the actual context of which I articulated. Where the record, in its entirety, clearly reflects the financial stability, cash on hand and assets of the

debtors and it's related entities and details of it's 100% repayment plans it is on the verge of presenting for conformation to this court.

13. On March 15, 2022, this Court is scheduled a hearing on the motion of Attorney Perez-Kudzma's to withdraw as counsel for the Debtor, even though she was terminated and let out of the cases by Attorney Bradford at the commencement of the 1st 341 meeting. In addition, I have asked the Court for an extension of thirty days to conduct a hearing on the undersigned's Application to be Employed and the Trustee's Objection thereto. Attorney Bradford continues to effectively block the Debtors' rights to due process and proper legal counsel, all the while the Debtor continues to be prevented from receiving the protection afford to all debtors of the United States Bankruptcy Court.
14. It is conceivable that on March 15, 2022, the Debtor and myself will be left without counsel where it is obvious that this was the calculated and spiteful objective of Attorney Bradford to leave the Debtor and myself without counsel. In hopes he could then look to sell his false narrative of my clinical sanity and wrongfully prosecute me for some sort of fraud upon the court, he has alleged on numerous occasions to both Debtors counsel, since the onset of the Debtors' filling of bankruptcy.
15. Our counsel is making every effort to bring in co-counsel and/or obtain successor counsel, where based upon the totality of the facts, the 30-day extension of time to engaged additional counsel and expansion of time to object to Attorney Bradford Chapter 7 motion to convert, is warranted. The 341 testimony of the creditors themselves, also has clearly determined these creditors considered themselves 1st mortgage secured parties, yet they have moved to collect the illicit and usurious debts against over 13 other closely related affiliate non-debtors, in two other courts and are seeking to attach over \$250 million dollars in other assets and cash reserves of, Nicholas Fiorillo.
16. There is no harm or prejudice to the creditor's at all, where they also have been just informed that there is millions of dollars that have been made available to the Debtors and their interrelated corporate affiliates, readily available to fund the Chapter 11 reorganization plan that has been facilitated by Nicholas Fiorillo, in his capacity as corporate officers of the debtors. There is no harm to the creditors should the Motion to object to Debtors counsel's and objection be postponed and file it's objections to Attorney Bradford motion to convert the cases.
17. The Debtors has specific rights to an evidentiary hearing, proper counsel to be present in order to provide the true facts and further testimony of the debtors financial affairs and assets and plans for its reorganization to this court.

18. Currently, both creditors have been informed, the funds to confirm the Chapter 11 plans are available and at the ready to retire their debts, if proven to be legitimate. These suspect creditors have yet to file any proof of claims, provide the Debtors with an accounting of the debts owed or provide a true and accurate pay off and release of the tens of millions of dollars of other collateral that have been unlawfully encumber or already illegal usurp by the creditors away from the debtors estates.
19. I, on behalf of the Debtor's have made every effort to settle and confirm the validity of it's two main creditors claims against the estates assets. In my position as manager of the Debtors. I have raised serious questions and asserted serious allegations that the creditors, Raymond Green and S & Q Data have been engaging in unfair and deceptive practices and/or illegal predatory lending and criminal debt collection activity against the debtors. I have requested on 5 different occasions that Attorney Bradford speak with Debtors counsel and myself behind closed doors about the allegations and evidence that we have now turned over to the Federal Authorities. Where I have stated numerous times, that I was afraid for my life and those of my family and in fear I was going to be killed by this group of criminals for exposing their illegal loan-shark-to-own predatory lending actions against me and the estate of the debtors.
20. I have attached a copy of the expanded correspondence provided on behalf of the Debtor, by Nicholas Fiorillo in my individual capacity and as I have detailed on the record at the 341 meetings. Where I have now submitted, as further supportive evidence to the attorney for the United States Trustee, there is in fact a criminal conspiracy to harm the Debtors and myself financially and otherwise. Such illegal activity and supporting evidence of these suspect creditors has been proffered to the Rhode Island Office of the FBI, to the Special Agent in Charge.
21. I am certain the creditors have continually violated numerous state and federal laws and have usurped millions of dollars of real estate and cash away from the Debtors. Most recently and over the course of years, in an obvious pattern of "loaning to own" their unsuspecting borrowers. Which has been further proven in the evidenced and statements given at the 341 meetings detailing those allegations is and now further evidence that has been annexed hereto as further supportive facts to my bolster my affidavit and has now been incorporated by reference attached.
22. In the attached communication, I had respectfully requested that Attorney Bradford immediately turn over such evidence to the Boston Office of the Federal Bureau of investigation which even after two subsequent request that he do so, he has failed to do so.

23. He has continually stated, the reasons for him not forward such evidence to the FBI, was that he had determined, he was certain I was mentally unstable, unfit to be in front of the court and I had obviously manufactured these allegations as a way not to repay the debts of what he was certain, was legitimate claims of the creditors.
24. As of the writing of this motion, the communication, I believe such evidence has not been turned over to the Boston Office of the FBI. Whereas attorney Bradford has dismissed "out of hand" that the criminal group exists, Raymond Green and Peter Spitalny and their associates are legitimate lenders and after his brief review of my such communication and evidence that was submitted, he has found no wrong doing.
25. Where he has blatantly dismissed such evidence as being unsubstantiated and I continued to be not fit psychologically Where he has been stating very early on in this case, that he felt I was borderline schizophrenic and suffered from varying degrees of mental illness, but some how he was certain I was a fraudster and embezzler that had defrauded Ray Green and the Spitalny Family out of millions of dollars. He had stated he felt, I had manifested these allegations, in a clear attempt to avoid Attorney Bradford efforts to prosecute me for his alleged bankruptcy fraud claims he deduced that I had committed at the 341 meetings.
26. Where he had determined, based upon his cursory review of his tainted facts, that I was in fact a fraudster, had embezzled millions of dollars away from Raymond Green and The Spitalny Family. Where he was certain, although in his clinical diagnosis, I was mentally ill and unstable, but somehow was also was a criminal master mind that was defrauding the US Bankruptcy Court. Where I was misleading him, cheating the creditors and systematically being evasive and untruthful at the 341 meeting he had conducted where he obstruct the debtors and my rights to have legal counsel represent us at such a Federal Proceeding.
27. The allegations I have raised here today, present serious questions as to the amount and/or legitimacy of the debts claimed to be owed to the creditors, if there is any. Where the debts themselves have been already repaid in well excess of any usurious money that claim to be owed and still outstanding. The Debtors can clearly prove, they where never in default on any loans, being no monthly payments where required to be repaid and such notes had already been paid in full, where as many millions of dollars in cash, equity stripping of property and illegal foreclosures, have already been extorted and embezzled away from the Debtors Estates
28. I know for certain this criminal group has clearly set out to use the appearance of a lawful debt collection and have been using unlawful means to collect such debts. They have continued to sell their "bad borrower" narrative to Attorney Bradford and he bought it "hook line and sinker".

Where it is apparent, he has sat on his hands and did nothing to investigate the legitimacy of the claims of wrong doing that are clearly criminal and nature that has been perpetrated as a pattern for many years, by the most notorious hard money lender in the history of Massachusetts, Raymond Green and his previously convicted felon partner in their predatory rackets, Peter Spitalny, the two time indicted tax cheat and embezzler.

29. I have proven the debtors are victims of these criminal activities of these suspect creditor's and their pattern of illegal acts of embezzlement, extortion and threats of financial and bodily harm, and their "pay up or be killed" predatory lending. Wherein, if the debtors and myself did not pay upwards of 350% in clearly usurious interest and continue to turn over assets and property of the debtors to these suspect creditors, not due or owing this criminal group. I would surely be killed and they would see it that my company's would ended up in financial ruin along with my family upon my death.
30. At a minimum, the Debtors should be given the opportunity to have co-counsel and/or successor counsel in place with sufficient time for the same to respond to the Motions object to removal of Debtor counsel and proper time to defend Attorney Braford's motions to convert. Whereas based on the totality of the circumstances, the debtors must be afforded the right to a evidentiary hearing to determined the validity of the these two motions to convert now pending before the court and address immediately address the motion to disqualify counsel. Whereas the court should also instruct the Chief US Attorney of the court to investigate the suspect creditors claims against the estate and immediately work with the debtors for the benefit of the estate and the legitimate creditors as we look to recover upwards of 10 million dollars that has already been ill gotten by these clearly predatory criminal suspect creditors of the Debtors estates.

Signed under the pains and penalties of perjury



Nicholas Fiorillo